

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

SCOTT WALKER, et al

PLAINTIFFS

VERSUS

CAUSE NO: 1:14-cv-381-KS-JCG

JIMMY WILLIAMSON, et al

DEFENDANTS

MOTION FOR ENTRY OF AGREED CONFIDENTIALITY AGREEMENT

Come now Jimmy Williamson, Jimmy Williamson, P.C., Cyndi Rusnak, Individually, and Cyndi Rusnak, PLLC (“Williamson and Rusnak”), by and through counsel, who hereby move the Court to enter the Agreed Confidentiality Order attached hereto as **Exhibit “A,”** as follows:

1. Discovery in this lawsuit has necessitated the disclosure of a great deal of confidential and proprietary information.
2. Some of this information relates to confidential information of third parties who are not involved in this lawsuit, including the clients of the parties.
3. The parties sought the entry of a protective confidentiality order several times, but could not, until recently, agree on the language or scope of such an order.
4. The parties continued with discovery while continuing to discuss and negotiate on the scope and language of a protective order.
5. The Agreed Confidentiality Order attached as Exhibit “A” is the result of those negotiations.
6. All parties now agree with the language and scope of the proposed Agreed Confidentiality Order attached as Exhibit “A,” and all parties agree that said order will facilitate

open communications and further discovery while protecting the confidential information which is the subject of this lawsuit.

7. Entry of the proposed Agreed Confidentiality Order will not cause a delay in this matter, or prejudice to any parties. To the contrary, it will expedite the production of information and evidence, and protect against any prejudice.

8. Counsel for all parties have agreed to the proposed Agreed Confidentiality Order.

WHEREFORE, PREMISES CONSIDERED, Williamson and Rusnak, with approval from all counsel, hereby respectfully move the Court to enter the proposed Agreed Confidentiality Order attached as Exhibit "A."

Respectfully submitted this, the 11th day of January, 2017.

JIMMY WILLIAMSON, JIMMY
WILLIAMSON, P.C., CYNDI RUSNAK,
AND CYNDI RUSNAK, PLLC, Defendants

HAGWOOD ADELMAN TIPTON PC

BY: /s/ J. Michael Coleman
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CERTIFICATE OF SERVICE

I, J. Michael Coleman, do hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF Filing System which will send notification of such filing to the counsel of record for all parties to this proceeding:

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This, the 11th day of January, 2017.

/s/ J. Michael Coleman
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